



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Pamela J. Cully Barbeau  
DOCKET NO.: 24-00190.001-R-1  
PARCEL NO.: 12-14-305-017

The parties of record before the Property Tax Appeal Board are Pamela J. Cully Barbeau, the appellant, and the Winnebago County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Winnebago** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$14,589  
**IMPR.:** \$79,745  
**TOTAL:** \$94,334

Subject only to the State multiplier as applicable.

### **Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Winnebago County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

### **Findings of Fact**

The subject property consists of a part one-story and part two-story dwelling of brick and vinyl siding exterior construction with 2,581 square feet of living area.<sup>1</sup> The dwelling was constructed in 2002 and is approximately 22 years old. Features of the home include a full unfinished basement, 2½ bathrooms, central air conditioning, a fireplace, a three-car garage containing 810 square feet of building area and a 906 square foot deck. The property has an approximately 19,892 square foot site<sup>2</sup> and is located in Rockford, Rockford Township, Winnebago County.

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<sup>1</sup> The appellant's appraiser included a detailed schematic drawing to support the size determination of 2,581 square feet of living area. The board of review reported a dwelling size of 2,577 square feet as depicted in the property record card along with a schematic drawing. Although the size discrepancy is small, the Board finds the appraiser's schematic drawing to be more detailed and thus the better evidence of dwelling size in the record.

<sup>2</sup> The appraiser reported a site size of 19,892 square feet. The board of review reports a site size of 43,771 which as shown on the property record card is the "equalized land value," not the size. Where size data would be depicted in the property record card is written: "No data (see gross)." On this limited and confusing documentation, the Board accepts the appraiser's lot size determination.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a Restricted Appraisal Report prepared by Tony Saladino, a Certified Residential Real Estate Appraiser, with the appellant as the only intended user “to evaluate the property . . . for tax settlement purposes.” The appraisal was prepared for purposes of a property tax appeal utilizing the comparable sales approach to value. The property rights appraised were the fee simple rights concluding an estimated market value for the subject property of \$283,000 as of January 1, 2024.

Saladino inspected the exterior only of the subject property on March 19, 2025.<sup>3</sup> As part of the appraisal, he reported the dwelling to be in average condition with physical depreciation due to normal wear and tear. He also stated no functional or external inadequacies exist.

Using the sales comparison approach, the appraiser provided information on six comparable sales which he stated were located in the subject’s immediate area so that location adjustments were not necessary. The parcels range in size from 11,700 to 31,609 square feet of land area which are each improved with Colonial dwellings of vinyl siding, brick, brick and stucco, or brick and vinyl siding exterior construction. The homes range in age from 29 to 44 years old and range in size from 2,414 to 2,786 square feet of living area. The conditions of sales #1, #2, #3 and #5 were reported as “average/good,” comparable #4 was reported as “good,” and comparable #6 was reported as “average.” Each dwelling has a full basement, four of which have finished area. Features include 2½ bathrooms, central air conditioning, and a two-car or a three-car garage. Outdoor amenities of the comparables vary and include porch, patio, deck, fence and/or irrigation systems. Comparables #2, #3, and #4 each have inground swimming pools. The comparables are located from .08 to .87 of a mile from the subject. The comparables sold from January to July 2023 for prices ranging from \$295,000 to \$370,000 or from \$113.20 to \$142.92 per square foot of living area, including land.

Comparable #1 was adjusted for financing/sales concession and then the appraiser made various adjustments to the comparables for differences from the subject in lot size, exterior construction, condition, dwelling size, basement finish, garage capacity, outdoor amenities, and/or inground swimming pools. Through this process, the appraiser estimated the comparables had adjusted sales prices ranging from \$264,750 to \$294,250. In reconciliation, Saladino reported that no one sale was far superior to the others and thus approximate equal consideration was given to each sale. However, on the page 1 of the Addendum, Saladino detailed individual percentage weights given to each of the six sales ranging from 15.7% to 18.1% and totaling 100.1%. As part of reconciliation, finding the opinion of value to be supported by the median of the adjusted sales and four of the adjusted values, the appraiser estimated the subject had a market value under the sales comparison approach of \$283,000 or \$109.65 per square foot of living area, including land.

In addition to the appraisal, the appellant submitted a series of 17 color photographs with handwritten notations on the back of each photograph. Four photographs of a tile floor have notations “tile cracked completely through across floor in front of closet doors”; “close-up of a

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<sup>3</sup> On page 3 of the appraisal it is stated “[t]he scope of this assignment included an interior and exterior viewing of the subject property.” However, the only photographs of the subject are exterior views with no interior photographs of the home.

portion area of cracks in tile (front of closet) cracked through”; “chip in ceramic tile floor”; and “chip in ceramic tile.” Two photographs are identified as “separation of asphalt from concrete of garage floor” and “sinking of asphalt entering garage.” Two photographs are identified as “bowed fence wood” and “separated fence panels.” Two photographs are each detailed as “roof of gazebo bowing wood.” There are seven photographs variously describing “rotting deck boards,” “warping/lifting,” “rotting stair,” “warping stair (deck)” and “rotting railing of deck.”

Based on the foregoing evidence, the appellant requested a total assessment reduction to \$94,334 which would approximately reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$102,059. The subject's assessment reflects a market value of \$306,208 or \$118.64 per square foot of living area, land included, based upon a dwelling size of 2,581 square feet and when using the statutory level of assessment for of 33.33%.<sup>4</sup>

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales along with property record cards for the subject and each of these comparables. The properties are located in the same neighborhood code as the subject and are each .2 of a mile from the subject. Parcel sizes are not reported and instead, the “equalized land value” as depicted on each property record card is set forth in the grid. The parcels are improved with “custom” two-story dwellings of brick and vinyl siding exterior construction. The homes range in age from 12 to 32 years old and range in size from 2,524 to 2,849 square feet of living area. Each comparable has a full basement with finished areas ranging from 252 to 1,100 square feet. Features of the homes include 2 or 3 full bathrooms, 1 or 2 half-baths, central air conditioning, and a garage of either 792 or 1,040 square feet of building area. Comparable #1 has a fireplace and each comparable has a deck ranging in size from 226 to 300 square feet. The comparables sold from April 2022 to January 2024 for prices ranging from \$365,000 to \$440,000 or from \$130.64 to \$174.33 per square foot of living area, including land.

Based on the foregoing evidence, the board of review requested confirmation of the subject’s assessment.

In rebuttal, the appellant detailed how each of the comparables presented by the board of review are “not fair comparables” to the subject which has not been changed since it was built in 2002, including the original laminate countertops, original tile and carpeting. As to comparable #1, the appellant contends the property was “professionally flipped” several years ago with a total remodel including high-end upgrades, finishes and appliances. Features include a finished recreation room in the basement, hardwood floors, a metal decorative fence, and Smart Home features along with solar panels. Comparable #2 has more bathrooms, hardwood floors, granite countertops, updated appliances, and a full brick front as compared to the subject. Likewise, comparable #3 presented by the board of review has granite countertops, a finished lower level with theater room, recreation room and wet bar along with a full bathroom, a heated garage, and

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<sup>4</sup> Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

a full brick front as compared to the subject. The appellant concedes that the subject has a much larger deck than the comparables presented by the board of review, but the subject's deck is also original and constructed with untreated pressure wood, much of which is rotting.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant submitted an appraisal of the subject property as of the lien date of January 1, 2024, and the board of review submitted three suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparables #2 and #3, due to differences in age when compared to the subject, additional bathrooms when compared to the subject, and that the sales occurred in 2022, dates more remote in time to the lien date at issue herein, and thus less likely to be indicative of the subject's market value. Moreover, based on the record, the Board further finds these two sales appear to be outliers on the high-end of sales prices in the subject neighborhood.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant along with support from board of review comparable sale #1. The appellant's appraiser estimated the subject property had a market value of \$283,000 as of January 1, 2024. In estimating the market value of the subject property, Saladino utilized the sales comparison approach and made adjustments to the comparables to account for differences from the subject. The Board finds the appraiser's conclusion of value appears credible, logical and reasonable in light of the sales within the report.

Additionally, the Board finds the appraised value is further supported by the raw sale comparable #1 submitted by the board of review which sold in January 2024 for \$365,000. Although this home is 10 years older than the subject, this property is similar otherwise to the subject in design, bathroom count and some features but as reported by the appellant was "professionally flipped" several years ago with multiple upgrades and renovations. Thus, the Property Tax Appeal Board finds the appraiser's estimate of value of \$283,000 is supported by the raw sale of board of review comparable #1, despite its upgrades, given the subject's newer overall age and larger deck which offset comparable #1's smaller finished basement area and larger garage.

Based on this record and after fully analyzing the evidence presented by both parties, the Property Tax Appeal Board finds a reduction to the subject's assessment commensurate with the appellant's request is justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: \_\_\_\_\_

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: \_\_\_\_\_

November 25, 2025



Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Pamela J. Cully Barbeau  
1622 Oakpark Dr.  
Rockford, IL 61107

COUNTY

Winnebago County Board of Review  
Winnebago County Admin. Bldg.  
404 Elm Street  
Rockford, IL 61101